

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

VS.

MATTHEW DELEO

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CR 16-000026-01M

MOTION TO CONTINUE

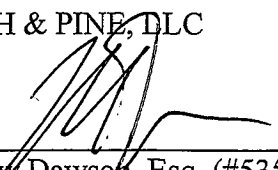
Now comes the Defendant MATTHEW DELEO, in the above captioned matter, by and through his attorney, Matthew S. Dawson, Esq. and moves for a continuance in the above-entitled matter, currently scheduled for trial calendar call on June 29, 2016, for a period of thirty (30) days. As grounds therefore the defendant avers that:

- (1) That additional period of 30 days is necessary for counsel for the continue to review voluminous discovery and to file any appropriate pre-trial motions.
- (2) Said continuance will also allow counsel for the defendant to continue negotiations with the government in an effort to resolve this case without the need for trial.
- (3) Both the defendant himself and the Government, through AUSA Paul F. Daly, Jr., has no objection to this request.
- (4) The time requested should be excludable under the Speedy Trial Act, 18 U.S.C. § 3161.

Wherefore, the defendant's respectfully requests that the Court find that the ends of justice is served by granting an excludable thirty-day continuance of the trial now scheduled for calendar call on June 29, 2016.

Respectfully submitted,
MATTHEW DELEO

By:
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CERTIFICATION

I hereby certify that I electronically filed, via the ECF filing system, and caused to be delivered a true copy of the within Motion for Continuance to Paul F. Daly, Jr., AUSA, on the 17th day of June, 2016.

